

1 PITE DUNCAN, LLP  
STEVEN W. PITE (NV Bar #008226)  
2 EDDIE R. JIMENEZ (NV Bar #10376)  
JACQUE A. GRUBER (NV Bar #11385)  
3 4375 Jutland Drive, Suite 200  
P.O. Box 17933  
4 San Diego, CA 92177-0933  
Telephone: (702) 413-9692  
5 Facsimile: (619) 590-1385  
E-mail: ecfnvb@piteduncan.com  
6

ABRAMS & TANKO, LLLP  
7 MICHELLE L. ABRAMS (NV Bar #005565)  
3085 S. Jones Blvd., Suite C  
8 Las Vegas, NV 89146

9 Attorneys for GMAC MORTGAGE, LLC

10 UNITED STATES BANKRUPTCY COURT  
11 DISTRICT OF NEVADA  
12

13 In re

14 JUAN A FAJARDO AND HERLINDA A  
FAJARDO,

15 Debtor(s).  
16

Bankruptcy Case No. BK-S-09-29501-bam

Chapter 13

GMAC MORTGAGE, LLCS REQUEST  
FOR SPECIAL NOTICE AND SERVICE  
OF PAPERS AND RESERVATION OF  
RIGHTS  
17  
18

19 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL  
20 INTERESTED PARTIES

21 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for GMAC  
22 Mortgage, LLC hereby requests special notice of all events relevant to the above-referenced  
23 bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced  
24 bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule  
25 2002, the commencement of any adversary proceedings, the filing of any requests for hearing,  
26 objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters  
27 which must be noticed to creditors, creditors committees and parties-in-interest and other notices as  
28 required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-

1 referenced bankruptcy court.

2 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master  
3 Mailing List in this case, the following address be used:

4 JACQUE A. GRUBER  
5 PITE DUNCAN, LLP  
6 4375 Jutland Drive, Suite 200  
7 P.O. Box 17933  
8 San Diego, CA 92177-0933

9 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,  
10 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a  
11 waiver of the within party's:

12 a. Right to have any and all final orders in any and all non-core matters entered only  
13 after de novo review by a United States District Court Judge;

14 b. Right to trial by jury in any proceeding as to any and all matters so triable herein,  
15 whether or not the same be designated legal or private rights, or in any case, controversy or  
16 proceeding related hereto, notwithstanding the designation or not of such matters as "core  
17 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant  
18 to statute or the United States Constitution;

19 c. Right to have the reference of this matter withdrawn by the United States District  
20 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

21 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to  
22 which this party is entitled under any agreements at law or in equity or under the United States  
23 Constitution.

24 All of the above rights are expressly reserved and preserved by this party without  
25 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing  
26 or by any other participation in these matters.

27 Dated: October 28, 2009

28 /s/ Jacques A. Gruber  
4375 Jutland Drive, Suite 200  
P.O. Box 17933  
San Diego, CA 92177-0933  
(702) 413-9692  
NV Bar #11385  
Attorney for GMAC MORTGAGE, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS AND RESERVATION OF RIGHTS was served on October 28, 2009.

Service was accomplished by the method and to the following as indicated:

BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

Juan A Fajardo  
Herlinda A Fajardo  
896 Navajo Lane  
Las Vegas, NV 89110

Jorge L. Sanchez  
Sanchez Law Group  
900 S. Fourth St., #100  
Las Vegas, NV 89101

Kathleen A. Leavitt  
201 Las Vegas Blvd. South, Suite 200  
Las Vegas, NV 89101

U.S. Trustee  
Department of Justice  
300 Las Vegas Boulevard, So.  
Suite 4300  
Las Vegas, NV 89101

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on October 28, 2009, at San Diego, California.

/s/ Mary K. Arnold  
MARY K. ARNOLD